REMARKS

Claims 1-5, 7-12, 14, 15, 17-23, 25-32 are pending in the present application, with claims 1, 14, and 24 being the independent claims. In summary of the outstanding Office Action, claims 1-5 and 7-12 are rejected under 35 U.S.C. 101, claims 1-5, 11 and 12 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lee et al. US Patent Application Publication No. 2002/0169788 in view of Garth et al. US Patent 5,873,091, and claims 14, 15, 17-23, 25-32 are rejected under 35 U.S.C. 102(e) as being anticipated by Lee et al. US Patent Application Publication No. 2002/0169788.

Claims 1-5 and 7-12 are rejected under 35 U.S.C. 101. The examiner maintained that:

> More specifically, the claimed subject matter provides for identifying nodes within the hierarchical data, however there is no link between this concept and the other elements recited within the body of the claim to enable loading (or copying) of the record from the buffer to the relational table.

While the Applicants do not agree that the examiner provided a proper basis for a section 101 rejection, nevertheless, the Applicants have amended the claims as described below. Applicants submit that the amendments to the claims address the examiner's bases above. Consequently, Applicants request reconsideration of the section 101 rejection.

Claims 1-5, 11 and 12 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lee et al. US Patent Application Publication No. 2002/0169788 in view of Garth et al. US Patent 5,873,091.

Applicants submit that the claims, as amended, patentably define over Lee at al. In the action, the examiner indicates that Lee teaches "creating a record in a first buffer associated with the first relational table and copying the record from the first buffer to the first relational table at paragraph 96, 108, 110." While Applicants do not necessarily agree with that analysis, Applicants have amended the claims to more clearly recite the claimed invention. Applicants submit that the claims as amended indicate that data in the hierarchical data source is associated with two different relational tables. The examiner indicated that

"Applicant's argument that the reference fails to show certain features are not cited in independent claims 1, 14 and 25." Action p. 3. Applicants have amended the claims to make this distinction more clear.

The claims as amended more clearly recite that some of the data from the hierarchical data source is stored in a first record associated with a first relational data prior to insertion into the corresponding relational table and some other of the data is stored in a second record associated with a second relational table.

More specifically, claim 1, as amended, recites:

> storing the data from the first node in a record in a first buffer associated with the first relational table;
>
> ....
>
> storing the data from the third node in a record in a second buffer associated with the second relational table;

As indicated by the excerpted portion of independent claim 1, data is stored in a record in a first buffer associated with the first table. Additionally, hierarchical data also has data corresponding to data to be stored in a row of a second relational table. For at least the foregoing reasons, independent claim 1 patentably defines over Lee alone or in combination with Garth.

Inasmuch as claims 2-5 and 7-12 depend from claim 1, they also patentably define over Lee at least for the same reasons.

Claims 14, 15, 17-23, 25-32 are rejected under 35 U.S.C. 102(e) as being anticipated by Lee et al. US Patent Application Publication No. 2002/0169788.

Claim 14, as amended, recites:

> mapping the hierarchical data to the at least one column in each of the at least two different relational tables based on the schema and creating in at least two different files where each file is associated with one of at least two different relational

tables records from the hierarchical data from nodes identified as data to be stored in the at least one column in each of the at least two different relational tables;

Lee does not teach or suggest mapping as claimed and streaming records into at least two different tables as claimed. For at least that reason, claim 14 also patentably defines over Lee.

In as much as claims 15 and 17-23 depend from claim 14, those claims also patentably define over Lee at least for the same reason. Claim 25, as amended, has a similar limitation to claim 14. For at least that reason, claim 25 also patentably defines over Lee.

Inasmuch as claims 26-32 depend from claim 25, they also define over Lee for at least the same reason.

CONCLUSION

Applicants' representative submits that claims 1-5, 7-12, 14, 15, 17-23 and 25-32 are in condition for allowance.

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